

R&F

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

2025 MAR 24 PM 3:12

In re:
KRIS ROGLIERI, Debtor
Chapter 7 Case No. 24-10157-REL

CLERK OF THE
BANKRUPTCY COURT
N.D. OF NY
ALBANY

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
TRUSTEE REMOVAL OPPOSITION (Dkt. No. 345)**

TO: The Honorable Robert E. Littlefield, Jr.,
United States Bankruptcy Judge:

I, Kris D. Roglieri, by and through my Attorney-in-Fact, Linda Oliver, respectfully request a 7-day extension to file my response regarding the Motion to Remove Chapter 7 Trustee Christian Dribusch (Dkt. No. 345).

The deadline to submit my response is **Friday, March 28, 2025**. Due to my current incarceration, I have extremely limited access to legal resources, documents, and communication, which has delayed my ability to finalize and properly prepare my reply.

I am making every effort to comply with the Court's orders and to respond thoroughly and respectfully. I believe a brief extension of **seven (7) days** through **Friday, April 4, 2025**, will allow sufficient time to complete my response under the circumstances.

This request is made in good faith and not for the purpose of delay. I respectfully ask the Court to grant this short extension so that I may fully address the issues before the Court.

Dated: March 25, 2025,

Respectfully submitted,

Kris D. Roglieri

By: Linda Oliver, Attorney-in-Fact

N-4 #45131

Rensselaer County Jail

4000 Main Street

Troy, NY 12180



UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:
KRIS ROGLIERI, Debtor
Chapter 7 Case No. 24-10157-REL

CERTIFICATE OF SERVICE

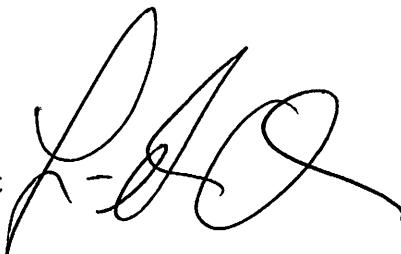
I, Linda Oliver, as Attorney-in-Fact for Kris D. Roglieri, hereby certify that on **March 22, 2025**, I caused a true and correct copy of the **Motion for Extension to File Response to Trustee's Opposition (Dkt. No. 345)**, to be served via U.S. Mail, First-Class, Postage Prepaid, upon the following parties:

Via U.S. Mail, First-Class, Postage Prepaid:

- **Honorable Robert E. Littlefield, Jr.**
United States Bankruptcy Court
Northern District of New York
445 Broadway
Albany, NY 12207
- **Clerk of the United States Bankruptcy Court**
United States Bankruptcy Court
Northern District of New York
445 Broadway, Suite 330
Albany, NY 12207
- **Christian Dribusch, Chapter 7 Trustee**
Dribusch Law Firm
187 Wolf Road, Suite 300-020
Albany, NY 12205
- **United States Trustee's Office**
Lisa M. Penpraze, Assistant U.S. Trustee
Leo W. O'Brien Federal Building
11A Clinton Avenue, Room 620
Albany, NY 12207

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: March 22, 2025,
Respectfully submitted,
KRIS D. ROGLIERI
By: Linda Oliver, as Attorney-in-Fact
N-4 #45131
Rensselaer County Jail
4000 Main Street
Troy, NY 12180

A handwritten signature in black ink, appearing to read "Kris D. Roglieri".